

I fully and completely support the well thought-out Comments submitted by The American Radio Relay League (ARRL) concerning Docket ET 03-104. I am convinced that proponents of "Broadband over Power Line" (BPL) completely disregard credible scientific data, and I do not support the approval of this docket at this time.

The frequencies and power levels selected by BPL's proponents have been poorly chosen, and if permitted to go forward, will cause inconceivable harm to existing emergency public service communications (including other non-emergency services). Further research and innovation in BPL technology are needed to avoid the interference that such technology in its present form will cause to services legally licensed to operate in the 2 MHz - 80 MHz frequency range.

I have seen data and examples of Broadband over Power Line (BPL) in the frequency ranges cited, and the interference potential can only be characterized as devastating. Due to the global nature of short wave radio propagation, the impact of BPL would be significant. It is important to point out that the frequencies utilized by BPL include nearly 95% of all short wave bands, a frequency spectrum that has always been better suited for long range and global point-to-point communication - NOT for Telephone Pole-to-Telephone Pole Internet distribution.

Because of the excessive "local" interference to radio communication by BPL technology, short wave radio frequencies (which BPL utilizes) would become unreliable and rendered virtually useless due to the high signal strengths employed by BPL, and its incompatibility to existing licensed services. One can cite many examples: Foremost in mind being health, welfare and distress messages transmitted from outside of the "local" area where BPL is used. Although any distant transmitter sending a message might not necessarily experience interference at its transmitting site, nearly EVERY "local" receiving station would be incapable of detecting the signal due to the "locally" elevated signal strength of BPL. Such elevated BPL signal strengths would prevent reception of all weak short wave radio signals.

Complicating all of the above, the proponents of BPL envision a national distribution of such a network. Based on this scenario, if another "9-11" were ever to occur again, it would compound a national disaster to virtually criminal proportions if our present "well functioning" emergency communication system/network were deliberately compromised and rendered useless by this BPL interest.

It is clear to me that approval of ET 03-104 would violate the existing FCC rules on non-interference and would be contrary to the best interest of the public.

Peter C. Buehner, N8PB
peter@buehner.net